

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

GODO KAISHA IP BRIDGE 1,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Case No. 2:21-CV-213-JRG
	§	(Lead Case)
	§	
TELEFONAKTIEBOLAGET LM	§	
ERICSSON and ERICSSON INC.,	§	JURY TRIAL DEMANDED
	§	
Defendants.	§	
	§	
GODO KAISHA IP BRIDGE 1,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Case No. 2:21-CV-215-JRG
	§	(Member Case)
	§	
NOKIA CORPORATION, NOKIA	§	
SOLUTIONS AND NETWORKS OY, and	§	JURY TRIAL DEMANDED
NOKIA OF AMERICA CORPORATION,	§	
	§	
Defendants.	§	
	§	

PARTIES' AMENDED JOINT CLAIM CONSTRUCTION CHART

Pursuant to Patent Rule 4-5(d) and this Court's October 22, 2021 Docket Control Order (Dkt. 45), Plaintiff Godo Kaisha IP Bridge 1 ("Plaintiff" or "IP Bridge") and Defendants Telefonaktiebolaget LM Ericsson and Ericsson Inc., and Nokia Solutions and Networks Oy, and Nokia of America Corporation (collectively, "Defendants") hereby submit this Amended¹ Joint Claim Construction Chart. The chart, attached hereto as Exhibit A, includes the parties' proposed

¹ This amendment reflects that the parties have now agreed to the construction of the term "subcarrier block" from claim 11 of U.S. Patent No. 9,137,000.

constructions for the disputed terms, as well as the constructions on which the parties have reached agreement, for each of the Asserted Patents.²

Since the parties submitted their P.R. 4-3 Joint Claim Construction and Prehearing Statement (Dkt. 66), IP Bridge submitted the following preliminary election of claims:

- '820 patent: claim 4³
- '546 patent: claims 6-8
- '000 patent: claims 11-16
- '239 patent: claims 14-19
- '594 patent: claims 1, 2, 5-9, 11, 12
- '724 patent: claims 12, 13
- '909 patent: claims 1, 3
- '275 patent: claims 1, 2, 6,⁴ 11

Thus, Exhibit A does not address any terms or claims that were not included in IP Bridge's preliminary election of claims.

² The Asserted Patents are U.S. Patent No. 7,372,909, U.S. Patent No. 8,077,594, U.S. Patent No. 8,085,724, U.S. Patent No. 8,385,239, U.S. Patent No. 8,526,546, U.S. Patent No. 8,787,275, U.S. Patent No. 9,137,000, and U.S. Patent No. 9,769,820. No party proposed any terms from the '275 patent for construction.

³ Claim 4 of the '820 patent is asserted against Nokia but not Ericsson.

⁴ Claim 6 of the '275 patent is asserted against Ericsson but not Nokia.

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Steven Pepe
(NY Bar No. 2810430)
(Eastern District of Texas Member)
Kevin J. Post
(NY Bar No. 4382214)
(Eastern District of Texas Member)
Alexander E. Middleton
(NY Bar No. 4797114)
(Eastern District of Texas Member)
Matthew R. Shapiro
(NY Bar No. 5102017)
(Eastern District of Texas Member)
Lance W. Shapiro
(NY Bar No. 5397955)
(Eastern District of Texas Member)
ROPES & GRAY LLP
1211 Avenue of the Americas
New York, NY 10036
Telephone: (212) 596-9000
Facsimile: (212) 596-9090
steven.pepe@ropesgray.com
kevin.post@ropesgray.com
alexander.middleton@ropesgray.com
matthew.shapiro@ropesgray.com
lance.shapiro@ropesgray.com

Samuel L. Brenner
(MA Bar No. 677812)
(Eastern District of Texas Member)
ROPES & GRAY LLP
Prudential Tower
800 Boylston Street
Boston, MA 02199-3600
Telephone: (617) 951-7000
Facsimile: (617) 951-7050
samuel.brenner@ropesgray.com

Respectfully submitted,

/s/ Alexander E. Middleton

Melissa R. Smith
GILLAM & SMITH, LLP
TX State Bar No. 24001351
303 S. Washington Avenue
Marshall, Texas 75670
Telephone: (903) 934-8450
Facsimile: (903) 934-9257
melissa@gillamsmithlaw.com

James R. Batchelder
(CA Bar No. 136347)
(Eastern District of Texas Member)
Shong Yin
(CA Bar No. 319566)
(Eastern District of Texas Member)
ROPES & GRAY LLP
1900 University Avenue, 6th Floor
East Palo Alto, CA 94303-2284
Telephone: (650) 617-4000
Facsimile: (650) 617-4090
james.batchelder@ropesgray.com
shong.yin@ropesgray.com

Attorneys for Plaintiff
GODO KAISHA IP BRIDGE 1

McKool Smith, P.C.

Kevin Hess
Texas State Bar No. 24087717
khess@mckoolsmith.com
McKool Smith, P.C.
303 Colorado Street, Suite 2100
Austin, Texas 78701
Telephone: (512) 692-8700
Telecopier: (512) 692-8744

Samuel F. Baxter
Texas State Bar No. 01938000
sbaxter@mckoolsmith.com
McKool Smith, P.C.
104 East Houston Street, Suite 300
Marshall, TX 75670
Telephone: (903) 923-9000
Telecopier: (903) 923-9099

/s/ Nicholas Mathews
Douglas A. Cawley
Texas State Bar No. 04035500
dcawley@McKoolSmith.com
Nicholas Mathews
Texas State Bar No. 24085457
nmathews@McKoolSmith.com
Warren Lipschitz
Texas State Bar No. 24078867
wlipschitz@mckoolsmith.com
Eric Hansen
Texas State Bar No. 24062763
ehansen@mckoolsmith.com
Alexander Chern
Texas State Bar No. 24109718
achern@mckoolsmith.com
Eleanor Hudson Callaway
Texas State Bar No. 24120740
ecallaway@mckoolsmith.com
McKool Smith, P.C.
300 Crescent Court Suite 1500
Dallas, TX 75201
Telephone: (214) 978-4000
Telecopier: (214) 978-4044

**ATTORNEYS FOR DEFENDANTS
TELEFONAKTIEBOLAGET LM
ERICSSON AND ERICSSON INC.**

BY: /s/ J. Ravindra Fernando

David S. Frist
david.frist@alston.com
John D. Haynes
john.haynes@alston.com
One Atlantic Center
1201 West Peachtree Street
Atlanta, GA 30309-3424
Telephone: (404)-881-7000
Facsimile: (404) 881-7777

J. Ravindra Fernando
ravi.fernando@alston.com
One South at The Plaza
101 South Tryon Street
Suite 4000
Charlotte, NC 28280-4000
Telephone: 704.444.1000
Facsimile: 704.444.1111

***Attorneys for Defendants Nokia Solutions
and Networks Oy and Nokia of America
Corp.***

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Nicholas Mathews
Nicholas Mathews